

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF RHODE ISLAND

In re:

Robert E. Sousa

Debtor

*Form E: Joint Status Report*  
**THREE PAGE DOCUMENT**

BK No. 13-13245-DF

Chapter 13

**JOINT LOSS MITIGATION STATUS REPORT**

Date: **December 22, 2014**

The Debtor(s) requested loss mitigation as to the first mortgage on the real property located at 21 Blanding Avenue, Barrington, RI 02806 on December 20, 2013 with Wells Fargo Bank, National Association ("Creditor").

The Court entered a loss mitigation order on: **January 8, 2014**

The Creditor filed its contact information on: **January 17, 2014**

The Debtor has not submitted a loan modification application to the Creditor.

~~If this is a Chapter 7 case, the Debtor(s) have filed the financial management course certificate with the Court on 9/26/2014, or if not yet due, will file the certificate with the Court by the due date of N/A~~

**Current Status**

Please complete one:

~~The most recent status hearing was held on **September 10, 2014**.~~

- The parties filed a proposed Consent Order (Form F) on **December 9, 2014** which the Court entered in lieu of holding a status hearing.

**Actions Required:**

The Court, by post-hearing Order or entry of the parties' proposed Consent Order (Form F), required the following actions to be completed by the parties by the dates noted:

If the Debtor accepts the loan modification, Debtor must execute the modification agreement by 12/17/2014 and return executed document to Creditor by said date.

Did the Debtor(s) comply with all ordered deadlines? Yes. If No, provide a full explanation of why the deadlines were not met.

Did the Creditor comply with all ordered deadlines? N/A. If No, provide a full explanation of why the deadlines were not met

Outstanding Document Request:

~~The following documents requested by Lender will be submitted by the Debtor(s) to the Creditor by December 12, 2014:~~

**Expected Completion of Loss Mitigation – If Trial Plan or Loan Modification Agreed To**

Please indicate as applicable:

The Debtor(s) is/are currently participating in a trial payment plan period with the final trial payment scheduled to be paid on **December 1, 2014**

~~The parties have agreed to a permanent or temporary loan modification. \_\_\_\_\_~~

~~If a Chapter 7 case and the parties have agreed to a permanent or temporary loan modification:~~

~~The parties agree that loss mitigation can terminate as successfully completed and will file Form D by \_\_\_\_\_; or~~

~~\_\_\_\_\_ is the date by which loss mitigation can terminate as successfully completed and the parties will file Form D by \_\_\_\_\_.~~

~~If the case is pending under Chapter 13 and a loan modification has been agreed to, the parties agree to file a Motion to Approve Loan Modification by \_\_\_\_\_, and upon approval of such motion, the parties will file Form D and loss mitigation can terminate as successfully completed.~~

**Consent Order**

The parties have attached<sup>1</sup> a proposed Consent Order (Form F) setting forth agreed deadlines for further action by the parties to accompany this Status Report.

Debtor(s)  
By counsel:

/s/ Edward J. Gomes  
Edward J. Gomes, Esquire  
Attorney and Counselor at Law  
91 Friendship St Ste 3  
Providence, RI 02903-3837  
(401) 521-5140  
Fax: (401) 421-0876  
[attyejg@yahoo.com](mailto:attyejg@yahoo.com)

Creditor  
By counsel:

/s/ Tatyana P. Tabachnik  
Tatyana P. Tabachnik, Esquire (RI#8911)  
Harmon Law Offices, PC  
150 California Street  
Newton, MA 02458  
Tel: 617-558-0500  
Fax: 617-243-4049  
[ribk@harmonlaw.com](mailto:ribk@harmonlaw.com)

---

<sup>1</sup> When filing the Status Report and proposed Consent Order in ECF, Form F should be filed as an attachment to Form E using the event Loss Mitigation Status Report [located under Bankruptcy>Loss Mitigation menu].